

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Shiloh Church Road Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #10
Shiloh Church Road Site
A38Q
Nathalie, VA
Latitude: 36.9699000 Longitude: -78.9807000

To: Lauren Pillow, VDEQ
Ray Earp, VDEM
Mr. Steven Dishman, Halifax County
Briana Bill, VDH

From: Christine Wagner, OSC

Date: 8/17/2019

Reporting Period: 8/12/19-8/16/19

1. Introduction

1.1 Background

Site Number:	A38Q	Contract Number:	
D.O. Number:		Action Memo Date:	5/23/2019
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	6/27/2018
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category -- Removal Action

1.1.2 Site Description

The Shiloh Church Road Site consists of three privately owned parcels of property. Two of the properties were historically used for a salvage yard and convenience store. During EPA's Removal Assessment, hazardous substances including, but not limited to PCBs, lead, and radioactive debris were identified. The assessment also revealed the presence of battery casings containing lead third property. The source of the hazardous substances on the third property are related to the other two properties.

1.1.2.1 Location

The Site is located near the intersection of LP Bailey Highway and Shiloh Church Road in Nathalie, Virginia, an unincorporated area of Halifax County.

1.1.2.2 Description of Threat

Elevated levels of volatile organic contaminants in drinking water wells above EPA Maximum Contaminant Levels ("MCLs")
Elevated levels of PCBs in surface soils;
Elevated levels of lead in surface soils;
Drums, cylinders, and other containers which contain hazardous substances;
Debris and soil which contain radioactive substances.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A removal assessment indicated that hazardous substances are present which pose an imminent and substantial threat to public health, welfare, and the environment.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In May and July of 2018, EPA performed a removal assessment at three properties near the intersection of LP Bailey Highway and Shiloh Church Road.

The results of the Removal Assessment indicated the presence of hazardous substances which meet the criteria listed in 40 CFR 300.415b. An Additional Funding Request Exemption from Statutory Limits and Request for Exemption to the 12-Month Statutory Limit and Change in Scope of Work was signed by the Superfund and Emergency Management Director on May 23, 2019.

2.1.2 Response Actions to Date

Based on sampling performed since July, EPA established three separate waste streams on Site. Pile #1 will contain debris and soil which contains PCBs > 50 ppm and fails EPA toxicity testing (D-wastes). Pile #2 contains soil and debris which contains PCBs<50 ppm and fails EPA Toxicity testing (D wastes). A third waste stream will be set up for soil or debris that contains >1000 ppm of PCBs.

A very large parachute was discovered in the mound area. The parachute is mingled with debris. PCB articles, as well as radiation discrete objects, have been discovered in the parachute. ERRS is in the process of extracting the parachute and moving it to an area where it can be more properly assessed.

The OSC contacted VDEQ to inquire if any Virginia ARARs conflict with EPA's plans for the RCRA waste streams. VDEQ informed EPA that Virginia have no hazardous waste ARARs which exceed RCRA.

A representative from VDH was on Site. The OSC identified residences where sampling is recommended. VDH will assist EPA in contacting these residents.

The OSC and ERRS RM met with a resident who is eligible for a water treatment system. ERRS collected a water sample to be checked for water quality parameters.

ERRS collected cylinders from around the Site and moved them to the drum staging area.

ERRS collected photo developer bottles and bulked them into a tote.

ERRS collected soil from the radiation boxes and sent them for gamma spectroscopy analysis. This is necessary to arrange for proper disposal.

ERRS began sifting Mound #2 for additional PCB articles and radiation debris. START is identifying and documenting the radiation debris.

ERRS began excavation of Mound #3.

START collected samples from the following areas:

1 - 5 point composite of driveway from road to parking space

1-5 point composite from driveway turnaround to cylinder staging area

1-5 point composite from soil in original drum area

1 grab sample from unvegetated mound near drum area

1 grab sample from vegetated mound area inside horseshoe

Administrative Record has been updated with additional information

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The source of the potential contamination has not been identified. EPA is working with enforcement officials to develop an enforcement strategy. START is collecting any debris which contains markings. The markings are being documented for possible future PRP response. OSC Duffy contacted a former employee of GE because at least one PCB article had old GE markings. From the old markings, the employee was not able to affirmatively identify if the article contained PCBs.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Excavation of the mound areas to continue. Waste will be sampled intermittently to determine appropriate waste stream

2.2.1.1 Planned Response Activities

The response actions will include removal of the hazardous substances identified in the Action Memo.

2.2.2 Issues

Administrative record was updated this date

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

A modification to the ERRS Task Order was made on 6/29/19, raising the ERRS Site ceiling to \$686,000
A new Removal TDD was assigned to START. The new ceilings are noted below
The accounting listed below reflects the funding authorized in the May 23, 2019 Decision Document

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$686,000.00	\$368,299.00	\$317,701.00	46.31%
START	\$239,725.00	\$31,047.00	\$208,678.00	87.05%
Intramural Costs				
Total Site Costs	\$925,725.00	\$399,346.00	\$526,379.00	56.86%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Heat is a major concern on Site. Temps in the high 90s is limiting time in the hot zone.
Hot zone entries are now modified Level D with continuous dust control and perimeter air monitoring

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

Halifax County -Halifax County Emergency Management
Virginia Department of Health
Virginia Department of Radiological Health
Virginia Department of Environmental Quality
Virginia Department of Emergency Management
EPA

3.2 Cooperating Agencies

ATSDR

4. Personnel On Site

EPA - 1
ERRS - 8
START - 4

5. Definition of Terms

ARARs - Applicable, Relevant, and Appropriate Requirements
ATSDR - Agency for Toxic Substances Disease Registry
EPA - US Environmental Protection Agency Region 3
EPA ERT - Environmental Protection Agency Environmental Response Team
ER - Environmental Restoration LLC (EPA's cleanup contractor)
ERRS - Emergency Response and Rapid Services (Contractor)
HASP - Health and Safety Plan
MCL - Maximum Contaminant Level for Public Drinking Water Supplies
PCE - Perchloroethylene, (also known as tetrachloroethylene)
START - Superfund Technical Assistance Response Team (EPA Contractor)
SVOC - Semi-volatile organic contaminants
TCE - Trichloroethylene
VDH - Virginia Department of Health
VDEM - Virginia Department of Emergency Management
VDEQ - Virginia Department of Environmental Quality
VOC - Volatile Organic Contaminants

6. Additional sources of information

6.1 Internet location of additional information/report
response.epa.gov/ShilohChurchRoadSite

7. Situational Reference Materials

No information available at this time.

